

# **EXHIBIT M**

**KENNETH S. FERARU**

ATTORNEY AT LAW  
A PROFESSIONAL CORPORATION  
1225 FRANKLIN AVENUE  
SUITE 325  
GARDEN CITY, NEW YORK 11530

(516) 535-3333  
Fax: (516) 535-4090  
KFERARUESQ@AOL.COM

June 8, 2022

ADMITTED TO THE NEW YORK AND  
NEW JERSEY BARS

DIANA D. FERARU  
OFFICE MANAGER

Honorable Justice Presiding  
Supreme Court, New York County  
60 Centre Street  
New York, New York 10007

Re: KHAN FUNDS MANAGEMENT AMERICA, INC. and XUEFENG DAI v. NATIONS  
TECHNOLOGIES INC., NATIONS TECHNOLOGIES (USA) INC., YINGTONG  
SUN, ZHAOXUE LUO, BAOXIN HUANG, JUNJIE YU, and DOES 1-20  
Index No.: 153098/2022  
Our File No.: 22D0191

Your Honor:

I am counsel to plaintiffs KHAN FUNDS MANAGEMENT AMERICA, INC. and XUEFENG DAI (collectively, "Plaintiffs") and write to advise the Court that defendant NATIONS TECHNOLOGIES (USA) INC. ("NATIONS USA") has defaulted with regard to Plaintiffs' verified complaint.

On May 5, 2022, defendant NATIONS USA was served process at its business address, registered with the California Secretary of State, of 3509 Langdon Common, Fremont, California 94538 (see, NYSCEF Doc. No. 7, Affidavit of Service). As set forth in Plaintiffs' proof of service of the summons and verified complaint upon NATIONS USA, process was delivered to the registered business address of NATIONS USA via personal service upon JIE LIANG; Mr. Liang holds dual employment with both NATIONS USA and defendant NATIONS TECHNOLOGIES INC. ("NATIONS") and is an officer and director of defendant NATIONS USA and vice general manager and agent of NATIONS. Thus, delivery of the summons and complaint upon him constitutes prima facie evidence of proper service pursuant to CPLR §311.

Accordingly, it is Plaintiffs' position that the deadline for defendant NATIONS USA to answer or move against Plaintiffs' verified complaint has now expired, and as NATIONS USA has neither answered nor moved nor obtained an extension of such deadline, NATIONS USA has defaulted with regard to Plaintiffs' verified complaint.

We write to further advise this Court that Plaintiffs

intend to file their motion forthwith pursuant to CPLR §3215 directing the entry of a default judgment on liability against defendants NATIONS USA with respect to the six causes of action alleged by Plaintiffs against NATIONS USA in the verified complaint, and scheduling an inquest to assess and determine the amount of damages in Plaintiffs' favor against NATIONS USA.

Thank you for your courtesies, efforts and attention in this matter.

Respectfully yours,

KENNETH S. FERARU, P.C.

A handwritten signature in black ink, appearing to read "Kenneth S. Feraru", is written over the typed name. The signature is fluid and cursive, with the first name "Kenneth" and last name "Feraru" clearly distinguishable.

Kenneth S. Feraru, Esq.

KSF:ksf

cc: NATIONS TECHNOLOGIES INC. (via regular mail)  
NATIONS TECHNOLOGIES (USA) INC. (via regular mail)  
YINGTONG SUN (via regular mail)  
ZHAOXUE LUO (via regular mail)  
BAOXIN HUANG (via regular mail)  
JUNJIE YU (via regular mail)